



STATE OF HAWAII
DEPARTMENT OF HEALTH

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In reply, please refer to:
EMD / CWB

11046PJLS.06c

DATE: November 30, 2006
NPDES PERMIT NO.: HI S000005

**FACT SHEET: REAPPLICATION FOR A NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE
MUNICIPAL STORM WATER RUNOFF AND CERTAIN
NON-STORM WATER DISCHARGES TO STATE WATERS**

**FACILITY: STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION, AIRPORTS DIVISION (DOT-AIR)
HONOLULU INTERNATIONAL AIRPORT (HNL)
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM (SMALL MS4)
HONOLULU, OAHU, HAWAII**

**PERMITTEE: STATE OF HAWAII
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PERMIT STATUS

NPDES Permit No. HI 0021440 was issued on July 10, 2001, effective on August 10, 2001, and expired at midnight on June 1, 2006. On October 6, 2005, the Department of Health (DOH) received one (1) copy of the permit reapplication consisting of the *Annual Report Fiscal Year 2004-2005*, dated August 2005, and the Signatory and Certification Statement to NPDES Permit Applications, dated September 26, 2005. The DOH administratively extended the NPDES permit by letter, dated June 1, 2006, pending the reapplication processing. The permit number has been revised to HI S000005. The Permittee is required to act consistently with the existing permit during the pendency of its renewal application.

All HNL tenants and privately-owned facilities (i.e., U.S. Post Office, Federal Aviation Administration (FAA) Tower and Regional Air Traffic Control Center, and Federal Detention Center) who conduct operations meeting the definition of industrial activities under 40 CFR §122.26(b)(14) which discharge storm water into the HNL Small MS4 are required to submit to the DOH their own Notice of Intent to be covered by Hawaii Administrative Rules (HAR), Chapter 11-55, Appendix B - NPDES General Permit Authorizing Discharges of Storm Water Associated with Industrial Activities or No Exposure Certification for the Conditional No Exposure Exclusion. With the exception of the facilities listed under the “Facility Description” section of this Fact Sheet, these facilities shall also obtain approval to connect to the HNL Small MS4. The Permittee shall ensure that all discharges from the HNL Small MS4 comply with applicable water quality standards.

On January 30, 2006, the Court entered the Consent Decree in U.S. and Hawaii DOH vs. DOT [Docket No. CV 05-00636 HG (KSC)]. The DOT obligations under the following EPA Administrative Orders were terminated by EPA letter, dated January 31, 2006, from Ms. Alexis Straus, Director, Water Division:

1. Docket No. CWA-402-9-99-029, issued on September 7, 1999
2. Docket No. CWA-402-9-00-001, issued on October 25, 1999
3. Docket No. CWA-402-9-00-021, issued on June 6, 2000
4. Docket No. CWA-402-9-00-022, issued on June 6, 2000
5. Docket No. CWA-402-9-03-001, issued on October 30, 2002.

The Director of Health (Director) has reviewed this permit application and applicable laws and regulations and proposes to issue an NPDES permit to the applicant valid until midnight on June 1, 2011. This proposed permit contains those terms and conditions which the Director has determined are necessary to carry out the provisions of the Federal Clean Water Act, as amended, (33 U.S.C.1251 et seq.; the “Act”); and Hawaii Revised Statutes, Chapter 342D.

FACILITY DESCRIPTION

The FY2004-2005 Annual Report, Section 1.1 - Overview of the Airport states “Honolulu International Airport (HNL) lies on the southern (leeward) side of Oahu, and encompasses approximately 5,211 acres, including Keehi Lagoon. Hickam Air Force Base bounds the Airport to the West, Sand Island to the East, Nimitz Highway on the North, and the Pacific Ocean to the South. The HNL is a joint-use airport, serving civilian and military aviation. In 2004, the HNL served 19,334,674 passengers and accommodated 320,520 aircraft operations. The Airport supports numerous tenants which provide various services, including air carrier operations, air taxi and air tour operations, general aviation operations, food and beverage concessionaires, gift shops, rental car companies, air cargo services, aircraft maintenance and support, ground support equipment, and automobile parking and repair.

The main passenger terminals are located on the North side of the airfield, with roadway connections to the H-1 Freeway and Nimitz Highway. All of the air carrier operations and the majority of passenger-related activities occur on the North side, which is known as the North Ramp.

The South Ramp consists of the aviation subdivisions along Lagoon Drive. These tenants include air cargo companies, aircraft maintenance companies, air tour and air taxi operators and general aviation aircraft parking.”

The Permittee owns, operates, and maintains the Small MS4 for the HNL on the Island of Oahu. The HNL Small MS4 is a system of conveyances, including storm drains, catch basins, drain inlets, oil/water separators, evaporation ponds, curbs, gutters, canals, culverts, and ditches, designed to collect and convey storm water runoff.

The five major drainage basins as indicated in the FY2004-2005 Annual Report are:

Drainage Basin	Commonly known as
A	South Ramp
B	Manuwai Canal
C	Mamala Bay via Marine Pond and Reef Runway
D	Kaloaloa Canal (formerly known as North Peripheral Ditch)
E	Ualena Street (discharges via City and County of Honolulu MS4 or Kaloaloa Canal)

The responsibility, coverage and liability for the following individual airline's facilities (formerly under the following Notice of General Permit Coverage [NGPC] File Numbers) will be transferred to the DOT-AIR Permit No. HI S000005, effective upon issuance of the NPDES permit:

1. HI R80B244 - Aloha Airlines
2. HI R80B276 - Continental Airlines, Inc. (Continental Micronesia, Chelsea Catering)
3. HI R80B278 - Delta Air Lines Gates and Aircraft Maintenance Area
4. HI R80B280 - Hawaiian Airlines Maintenance Hanger Area
5. HI R80B282 - Northwest Airlines, Inc.
6. HI R80B284 - United Parcel Service

The following facilities are currently covered by separate Conditional No Exposure Exclusions:

1. HI 02BB234 - Worldwide Flight Services, Inc. (expires September 18, 2007)
2. HI 02BB268 - United Airlines (expires September 19, 2007)
3. HI 02BB277 - Air Canada (expires September 19, 2007)
4. HI 02BB279 - FedEx Express (expires June 18, 2007)
5. HI 03BB712 - FedEx Ground (expires November 28, 2008)
6. HI 04BC013 - International Inflight Catering Co., Ltd. (expires September 8, 2009)
7. HI 06BC623 (fka HI R80B281) - Island Air (expires June 9, 2011)

The following facilities and construction projects are currently covered under separate NGPCs or have applied for coverage under an NPDES General Permit:

1. HI R80B222 - Hawaii Fueling Facilities Co. - Airport Bulk Fuel Storage
2. HI R80B238 - Airport Group International, Inc. - WIKI-WIKI Facility
3. HI R10C219 - Federal Aviation Administration - Honolulu International Airport Cable & PAPI Replacement Project
4. HI R10C309 - DOT-AIR - Commuter Terminal Parking Lot Resurfacing (not yet issued)

RECEIVING WATER CLASSIFICATION

The HNL Small MS4 discharges into Manuwai Canal and Kaloaloa Canal which are Class 2, Inland Waters and Mamala Bay, Keehi Lagoon, and the Reef Runway Marine Pond which are Class A, Marine Waters.

Hawaii Administrative Rules (HAR), Section 11-54-3(a) states that “[s]torm water discharge into State waters shall be allowed provided it meets the requirements specified in this section and the basic water quality criteria specified in section 11-54-4.”

As classified by the DOH in HAR, Section 11-54-3(b)(2), “[t]he objective of class 2 waters is to protect their use for recreational purposes, the support and propagation of aquatic life, agricultural and industrial water supplies, shipping, and navigation. The uses to be protected in this class of waters are all uses compatible with the protection and propagation of fish, shellfish, and wildlife, and with recreation in and on these waters. These waters shall not act as receiving waters for any discharge which has not received the best degree of treatment or control compatible with the criteria established for this class. ...”

As classified by the DOH in HAR, Section 11-54-3(c)(2), “the objective of class A waters that their use for recreational purposes and aesthetic enjoyment be protected. Any other use shall be permitted as long as it is compatible with the protection and propagation of fish, shellfish, and wildlife, and with recreation in and on these waters. These waters shall not act as receiving waters for any discharge which has not received the best degree of treatment or control compatible with the criteria established for this class. No new sewage discharges will be permitted within embayments. No new industrial discharges shall be permitted within embayments, with the exception of:

- “(A) Acceptable non-contact thermal and drydock or marine railway discharges, in the following water bodies: ...
 - (iii) Keehi Lagoon Marina Area, Oahu; ...
- “(B) Storm water discharges associated with industrial activities (defined in 40 C.F.R. Section 122.26(b)(14) and (b)(15), except (b)(15)(i)(A) and (b)(15)(i)(B)) which meet, at the minimum, the basic water quality criteria applicable to all waters as specified in section 11-54-4, and all applicable requirements specified in the chapter 11-55, titled “Water Pollution Control”; and
- “(C) Discharges covered by a National Pollutant Discharge Elimination System general permit, approved by the U.S. Environmental Protection Agency and issued by the Department in accordance with 40 C.F.R. Section 122.28 and all applicable requirements specified in chapter 11-55, titled ‘Water Pollution Control.’”

OCEAN DISCHARGE CRITERIA

The Director has considered the Ocean Discharge Criteria established pursuant to Section 403(c) of the Act for the discharge of pollutants into the territorial sea, the waters of the contiguous zone, or the oceans. The Environmental Protection Agency (EPA) has promulgated regulations for Ocean Discharge Criteria in Title 40 of the Code of Federal Regulations (40 CFR) Part 125, Subpart M. Therefore, the Director has determined that the discharge will not cause unreasonable degradation to the marine environment. Based on current information, the Director proposes to issue a permit.

DISCHARGE DESCRIPTION

The discharge consists of storm water runoff and certain non-storm water discharges which is collected by the HNL Small MS4 and discharged into State waters or into adjacent separately-owned storm sewer systems. The major pollutants of concern continue to be silt, nutrients, litter and debris, heavy metals, and petroleum hydrocarbons. The volume of discharge is dependent upon rainfall-induced runoff and is highly variable.

The 50 gallon per minute re-circulation water discharge from the water features in the Japanese, Chinese and Hawaiian gardens within the International Terminal Complex are an allowable non-storm water discharge to a storm drain and ultimately the Manuwai Canal. A drinking water connection supplies the garden water features. Some of the water features contain vertebrates.

DESCRIPTION OF THE EXISTING DISCHARGE QUALITY

Rainfall events which were tested and reported on the Discharge Monitoring Report (DMR) Forms were submitted in Appendix I of the Annual Reports. The maximums of the results from FY2000-2001 to FY2004-2005 are provided below:

DMR Daily Maximums from Appendix I

Parameter (units)	EA 100	EA 101	EA 102	EA 105	Koi Pond
Oil and Grease (mg/L)	<10	<10	<10	<10	{1}
Total Suspended Solids (TSS) (mg/L)	53	5.2	33.8	43	4.8
Total Dissolved Solids (mg/L)	5,670	7,130	20,500	382	{1}
Total Nitrogen (µg/L)	923	1,230	961	711	1,050
Nitrate + Nitrite [Nitrogen] (µg/L)	216	738	495	118	603
Total Phosphorus (µg/L)	370	255	190	275	315
Biological Oxygen Demand (BOD ₅) (mg/L)	8	2	4	4	{1}
Chemical Oxygen Demand (COD) (mg/L)	43	27	97	17	{1}
pH (standard units)	7.2	7.6	8.4	7.8	8.44
Temperature (°C)	24.3	27.1	26.5	26	23.2
Turbidity (ntu)	27	3.9	20.8	38	1.1
Ammonia (µg/L)	79	81	92	27	34
Dissolved Oxygen (mg/L)	7.4	n/a	n/a	3.4	9.56
Salinity (ppt)					0.3

NOTES:

- {1} = no data provided in DMR
- mg/L = milligrams per liter = 1000 micrograms per liter
- µg/L = micrograms per liter
- ntu = nephelometric turbidity units
- < # = indicates that the compound was not detected for the given level of detection listed in the table.
- ppt = parts per thousand

Samples were not tested for Benzene; Ethyl Benzene; Toluene; Xylene; Flow; TPH as diesel, gasoline, jet fuel, and avgas.

PROPOSED PERMIT DETERMINATIONS AND CONDITIONS

1. General Requirements listed in Part A. of the permit are necessary in preventing pollutants to be discharged with the storm water and certain non-storm water discharges to the receiving State waters.
2. Discharge Limitations listed in Part B. of the permit specify that the Permittee shall effectively prohibit non-storm water discharges through its MS4 into State Waters (per Section 402(p) of the Act). “Effectively prohibit” means that a non-storm water discharge shall be specifically regulated by a NPDES permit, or that the discharge is not considered a waste, or that the discharge does not contain constituents of concern which would necessitate an NPDES permit. NPDES permitted discharges and certain non-storm water discharges identified in Part B.2. of this permit may be allowed into the MS4 provided the DOT-AIR determines that such discharges will not contain pollutants in amounts that will result in a violation of an applicable water quality standard.

As required by Section 402(p) of the Act and 40 CFR §122.26(d)(2)(iv), the discharge of pollutants must be reduced to the “maximum extent practicable (MEP).” The activities described in the Storm Water Management Program Plan (SWMPP) shall meet this MEP control standard.

As also required by Section 402(p) and 40 CFR §122.26 (d)(2)(iv), the discharge of pollutants from industrial areas must be reduced using the “**best available technology economically achievable (BAT)**” and the “**best conventional pollution control technology (BCT)**” and the discharge from all other areas shall be reduced to the “**maximum extent practicable (MEP)**.” The activities described in the Storm Water Management Program in Part D. of the permit are designed to meet the BAT, BCT, and MEP treatment standards, as applicable.

3. Receiving Water Limitations listed in Part C. of the permit are restated from HAR, Chapter 11-54, Section 11-54-4(a). In accordance with HAR, Chapter 11-54, Section 11-54-3(a), existing storm water discharges into State Waters are allowed provided such discharges meet the basic water quality criteria listed in HAR, Chapter 11-54, Section 11-54-4 (and Part C.1. of this permit). The discharge shall not cause or contribute to a violation of any of the applicable beneficial uses or water quality objectives contained in HAR, Chapter 11-54, titled “Water Quality Standards.”
4. Storm Water Management Program (SWMP) listed in Part D. of the permit has been reorganized to standardize the MS4 permits and to utilize the six (6) components of the Small MS4 permitting program, in compliance with the minimum components of an MS4 SWMP [as set out at 40 CFR §122.26(d)(2)]. The SWMP shall be submitted to the DOH within one (1) year after the effective date of the permit and shall be fully implemented upon submittal to the DOH and EPA. The Permittee shall continue to implement the existing SWMP and Storm Water Pollution Control Plan (SWPCP) until submittal of the revision. All HNL tenants who conduct operations meeting the definition of industrial activities under 40 CFR §122.26(b)(14) shall submit their own SWPCP as required by HAR, Chapter 11-55, Appendix B, unless they obtain coverage under the HNL Small MS4 permit by obtaining approval from DOT-AIR. The DOT-AIR shall provide a list of HNL

Small MS4 covered HNL tenants to the CWB. These HNL tenants shall continue to comply with the SWMP.

- a. Public Education and Outreach
- b. Public Involvement/Participation
- c. Illicit Discharge Detection and Elimination
- d. Construction Site Runoff Control
- e. Post-Construction Storm Water Management in New Development and Redevelopment
- f. Pollution Prevention/Good Housekeeping

The Maintenance Facilities BMPs Program Plan training program shall identify why certain BMPs included in the training document tables are not applicable to the facilities and activities (e.g., Vehicle Maintenance BMPs did not include “28 - use drip pans under leaking equipment”).

- g. Industrial and Commercial Activities Discharge Management Program

The HNL tenants located on DOT-AIR property on the makai side of Ualena Street discharge into the City and County of Honolulu’s separate storm sewer system and shall obtain connection approval from the City and County of Honolulu.

- h. Hydrocarbon Removal and Remediation Plan

Section 11 - Hydrocarbon Removal and Remediation (page 8) of the Annual Report Fiscal Year 2004-2005 states, “In anticipation of the proposed construction of an International Terminal Building (ITB) on a site on Aolele Street, an assessment was conducted in 1989 and 1990. The assessment indicated the existence of a free product plume of Jet-A covering an area of 31 acres. Since then, the plans for the ITB have been delayed although it is in the HNL Master Plan for the year 2004. The HNL Master Plan is in the process of being updated, and other uses for the site will be considered. Therefore, no excavation has or will take place in the near future. However, DOT-AIR has been monitoring and remediating the site over the years by removing the free product.

“Since March 2001, Airport Group International, Inc. (AGI) has been operating its own free product recovery system. Two additional recovery wells were added to the system in August 2002. From July 2004 through April 2005, 9,512 gallons of fuel was recovered to date (see AGI monthly reports in Appendix F).”

- i. Modifications

Control measures for urban storm water management may need to be modified as new information is obtained, existing practices are evaluated, and new BMPs developed. Part D.3.a. of the permit allows either the Permittee or the Director to proposed changes to the SWMP. All modifications to this permit will be made

pursuant to any applicable requirements in the DOH's Standard NPDES Permit Conditions.

5. Monitoring Requirements listed in Part E. of the permit.
 - a. Monitoring Plan is due within 120 days after the effective date of the permit. Updates to the Monitoring Plan shall be included in the End-of-Year Report. The parameters have been updated to reflect the parameters required to be monitored under HAR, Chapter 11-55, Appendix B for discharges of storm water from industrial activities and HAR, Chapter 11-55, Appendix L for discharges of circulation water from decorative ponds or tanks.
 - b. Wasteload Allocations (WLAs) - As WLAs are adopted by DOH that identify the Permittee as a source, the Permittee shall develop implementation and monitoring plans for each additional WLA within one (1) year of the adoption date.
6. Reporting Requirements listed in Part F. of the permit.
 - a. End-of-Year Report will be a comprehensive evaluation of all activities undertaken during the fiscal year, including monitoring results and analysis. The report shall be organized like Part D. of the permit. Most of the information specified in the End-of-Year report is required by 40 CFR Section 122.42(c). The End-of-Year Report is due on August 31, 2007, and annually from that date thereafter.
 - b. Annual Monitoring Report is also due on August 31, 2007, and annually from that date thereafter, and shall be included in the End-of-Year Report.
 - c. Memorandum of Understanding (MOU) - Roles, Responsibilities, and Legal Authority of DOT-AIR

DOT-AIR shall continue to maintain and comply with the "Memorandum of Understanding Between the Department of Transportation, State of Hawaii, and DOH, State of Hawaii" which was executed on March 29, 2000, to help the DOT-AIR comply with its NPDES permit coverages for various airports. As stated in the MOU, 40 CFR 122.26(d)(2)(i) requires that DOT-AIR obtain the legal authority to control the discharge of pollutants to its Small MS4. Amendments to the MOU, if any, shall be summarized in the End-of-Year Report.

